

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

VENTAS REALTY, LIMITED)	
PARTNERSHIP,)	
)	
Plaintiff,)	
)	No. 12-CV-3107
)	
v.)	Judge Ronald A. Guzman
)	
)	Magistrate Judge Sidney I Schenkier
ALC CVMA, LLC, ALC GGMG, LLC)	
ALC HTIF, LLC, ALC PEDG, LLC, ALC)	
TPCG, LLC, ALC TISSC, LLC, ALC)	
TSKG, LLC AND ALC WRWG, LLC,)	
)	
Defendants.)	

**STATEMENT OF NO OBJECTION AND CONSENT BY DEFENDANTS TO
PLAINTIFF'S MOTION TO FILE FIRST AMENDED COMPLAINT**

Plaintiff Ventas Realty, Limited Partnership ("VRLP"), has moved the Court for leave to file an amended complaint. All Defendants consisting of ALC CVMA, LLC, ALC GGMG, LLC, ALC HTIF, LLC, ALC PEDG, LLC, ALC, TPCG, LLC, ALC TISSC, LLC, ALC, TSKG, LLC AND ALC WRWG, LLC (collectively "Defendants"), by their attorneys, Quarles & Brady LLP, have reviewed VRLP's motion and the attached proposed pleading and have determined not to object to VRLP's requested motion. Therefore, Defendants, consent to the Court granting VRLP's motion so that its proposed amended complaint may be filed in the action and served on counsel for Defendants for appropriate response. Naturally, in submitting this Statement of No Objection and Consent, the Defendants reserve their normal right to answer, or otherwise respond, to the allegations in the amended complaint, including without limitation, the right to state by answer or motion, all denials, defenses, affirmative defenses and counterclaims in the

manner and time permitted for responding to the amended pleading. Defendants would ask that the Court provide or note this reservation of rights in its confirming order.

Because Defendants consent to VRLP's motion for leave to file the amended complaint, a hearing on this matter is unnecessary. Further, because VRLP has requested the award of attorney's fees involved in this action, and brought at least three identified lawyers to the last hearing, the Defendants, in the interests of saving unnecessary fees and costs, and also to avoid creating new fees over which more disputes can ensue, would ask the Court to cancel any hearing on this procedural motion and resolve it on the written papers alone.

Dated: May 11, 2012

Respectfully submitted,

ALC CVMA, LLC, ALC GGMG, LLC, ALC HTIF, LLC, ALC PEDG, LLC, ALC TPCG, LLC, ALC TISSC, LLC, ALC TSKG, LLC and ALC WRWG, LLC

By: _____ /s/ Leonard S. Shifflett
Leonard S. Shifflett

Leonard S. Shifflett (ARDC No. 2587432)
leonard.shifflett@quarles.com
QUARLES & BRADY LLP
300 North LaSalle Street, Suite 4000
Chicago, IL 60654
(312) 715-5000 – telephone
(312) 715-5155 – facsimile

Also appearing pending admission *pro hac vice*

John A. Rothstein
john.rothstein@quarles.com
QUARLES & BRADY LLP
411 East Wisconsin Avenue
Milwaukee, WI 53202
(414) 277-5351 – telephone

CERTIFICATE OF SERVICE

I, Leonard S. Shifflett, an attorney, hereby certify that I caused the foregoing **Statement of No Objection and Consent by Defendants to Plaintiff's Motion to File First Amended Complaint** referenced therein to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following counsel of record at his e-mail address on file with the Court:

Roger H. Stetson
John W. Roberts
Brandon Prosansky
Rupa Rajagopalan
**BARACK FERRAZZANO KIRSCHBAUM
& NAGELBERG LLP**
200 West Madison Street, Suite 3900
Chicago, IL 60606
(312) 984-3100

Dated: May 11, 2012

/s/ Leonard S. Shifflett
Leonard S. Shifflett